

**BY ORDER OF THE  
SUPERINTENDENT**

**HQ UNITED STATES AIR FORCE  
ACADEMY INSTRUCTION 10-100**

**17 MAY 2016**

**Operations**

**UNITED STATES AIR FORCE  
ACADEMY UNMANNED AIRCRAFT  
SYSTEMS (UAS) PROGRAM**



**COMPLIANCE WITH THIS PUBLICATION IS MANDATORY**

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Certified by: USAFA/DFAN  
(Colonel Angela Suplisson)

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This instruction implements the laws, regulations and policies applicable to the domestic use of unmanned aircraft systems (UAS), including, but not limited to: the Presidential Memorandum, *Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems*; Deputy Secretary of Defense Policy Memorandum (DepSecDef PM) 15-002, “*Guidance for the Domestic Use of Unmanned Aircraft Systems*,” Air Force Instruction (AFI) 10-801, *Defense Support of Civil Authorities* (DSCA); and AFI 14-104, *Oversight of Intelligence Activities*. This United States Air Force Academy Instruction (USAFAI) applies to all Department of Defense personnel working with or on behalf of the United States Air Force Academy (USAFA) using Unmanned Aircraft Systems (UAS) when such use occurs on Department of Defense (DoD) controlled installations, within DoD Scheduled Special Use Airspace (SUA) or with USAFA UAS assets, including active duty, civilian, Air Force Reserve and Air National Guard personnel. This USAFAI codifies USAFA’s procedures, including required approvals and reporting requirements, with respect to any and all UAS use, with special emphasis on use involving domestic imagery and the collection or acquisition of information, as defined herein. It also clarifies the roles and responsibilities of USAFA assigned, attached or affiliated personnel with respect to use of UAS for: (1) USAFA training, testing, and research programs, including those that involve collaboration with private and/or commercial enterprises; (2) Federal, state, local, and tribal domestic imagery (DI) support requests; and (3) other potential exercises, missions, training or operations. The authorities to waive requirements in this publication are identified with a Tier 3 (T-3) number following the compliance statement. See AFI 33-360, *Publications and Forms Management*, for a description

of the authorities associated with the Tier numbers. Submit requests for waivers through the chain of command to the appropriate Tier waiver approval authority. The waiver authority for non-tiered requirements in this publication is the Superintendent, United States Air Force Academy (HQ USAFA/CC). Maintain official records in accordance with Air Force Manual (AFMAN) 33-363, *Management of Records*, and dispose of them in accordance with the Air Force Records Information Management System (AFRIMS) Records Disposition Schedule (RDS). Contact supporting records managers as required for approval. Send comments and suggested improvements to this instruction on Air Force (AF) Form 847, *Recommendation for Change of Publication*, to the USAFA DFAN Org box via Non-classified Internet Protocol Router Network (NIPRnet) or Secret Internet Protocol Router Network (SIPRNet) channels. This publication may not be supplemented without permission of the OPR.

**1. Purpose.** Domestic UAS use involving domestic imagery or the acquisition or collection of information involves a balancing of fundamental interests. Conducting UAS training, testing, and research at the USAFA is a mission-essential imperative. Providing incident awareness and assessment (IAA) support when requested and approved, is consistent with DoD and Air Force (AF) policy. UAS assets lend themselves to a wide variety of other potential and valuable uses. Regardless of the purpose for domestic UAS use, protecting privacy, civil rights and civil liberties guaranteed by the Constitution and the laws of the United States (U.S.) during such use is non-negotiable. The primary objective of this USAFAI is to ensure that assigned, attached or affiliated USAFA personnel using UAS on installations and facilities owned, or otherwise lawfully occupied by the DoD, in DoD Scheduled SUA, or with USAFA assets do not infringe on or violate these rights and interests. This instruction shall be reviewed no less than every 4 years per AFI 33-360, *Publications and Forms Management*, [Chapter 5](#), Paragraph 5.4.2.

## **2. Definitions.**

2.1. Acquisition or collection of information means obtaining data with a UAS that relates to U.S. persons (USPER) or non-DoD affiliated persons (NDAP), their activities or their property or non-DoD controlled facilities or property. For purposes of this instruction, assume UAS use to obtain domestic imagery will collect or acquire information and that the coordination and/or approval processes outlined herein will apply. (T-0)

2.2. Domestic Imagery (DI) is defined as any imagery obtained by UAS in the land areas of the 50 states, the District of Columbia, and the U.S. Territories and possessions, to a 12 nautical mile (NM) seaward limit of these land areas. (T-0)

2.3. DoD Scheduled Special Use Airspace (SUA) is defined as Warning Areas, Restricted Areas, Military Operating Areas (MOA), Prohibited Areas, Controlled Firing Areas, and National Security Areas, as well as military training routes. USAFA Scheduled SUA is a DoD Scheduled SUA. (T-0)

2.4. Surveillance for purposes of this USAFAI means physical surveillance, a systematic or deliberate observation of a person by UAS on a continuing basis; and electronic surveillance, both as defined by DoD 5240.1-R, *Procedures Governing The Activities of DoD Intelligence Components that Affect United States Persons*, the acquisition of a nonpublic communication by electronic means without the consent of a person who is a party to an electronic communication or, in the case of a non-electronic communication, without the consent of a person who is visibly present at the place of communication. Any surveillance requires high

level approval authorities. In addition, electronic surveillance is subject to the Foreign Intelligence Surveillance Act of 1978. (T-0)

2.5. UAS means an aircraft operated without the possibility of direct human intervention from within or on the aircraft except that UAS does not mean a “model aircraft” as defined in Section 336 of the Federal Aviation Administration (FAA) Modernization and Reform Act of 2012 (Section 336) that is flown in accordance with the below requirements. (T-0)

2.5.1. Section 336 defines a “model aircraft” as an unmanned aircraft that is:

2.5.1.1. Capable of sustained flight in the atmosphere;

2.5.1.2. Flown within visual line of sight of the person operating the aircraft; and,

2.5.1.3. Flown for hobby or recreational purposes.

2.5.2. A model aircraft is not a UAS if: (T-3)

2.5.2.1. The aircraft is flown strictly for hobby or recreational use;

2.5.2.1.1. Activities providing a service to any military organization are not considered recreational. Examples of non-hobby flying include filming a cadet formation to provide public relations or public affairs footage, performing class research flights after-hours or providing security monitoring.

2.5.2.1.2. No cameras or other imagery-collecting devices may be operated on any model aircraft without prior coordination with the UAS Air Operations Center (AOC) or the UAS Center.

2.5.2.2. The aircraft is operated in accordance with a community-based safety set of safety guidelines;

2.5.2.3. The aircraft is limited to not more than 55 pounds unless otherwise certified through a design, construction, inspection, flight test and operational safety program administered by a community-based organization;

2.5.2.4. The aircraft is operated in a manner that does not interfere with and gives way to an UAS or manned aircraft; and,

2.5.2.5. When flown within 5 miles of an airport with an air traffic facility, the operator of the aircraft provides the airport operator and the airport air traffic control tower with prior notice of the operation.

2.5.3. Model aircraft operations on USAFA must be coordinated with UAS AOC and/or the UAS Center.

2.6. Use of UAS outside of DoD Scheduled SUA means that either: (1) the platform is physically located outside of DoD Scheduled SUA or (2) information is or will be collected or acquired from outside of DoD-controlled installations.

**3. Applicability.** The requirements outlined in this USAFAI apply to DoD personnel (civilian and military) working with or on behalf of the United States Air Force Academy (USAFA) using Unmanned Aircraft Systems (UAS) when such use occurs on DoD controlled installations, within DoD Scheduled Special Use Airspace (SUA) or with USAFA UAS assets. (T-0) UAS use on DoD controlled installations or within DoD Scheduled SUA that does not involve

domestic imagery or the acquisition or collection of information, such as UAS research involving weather sensors that only gather atmospheric information, does not trigger the requirements outlined in paragraph 5 of this USAFAI; however, the coordination requirements outlined in paragraphs 6-7 and Attachment 2 shall apply. (T-0)

**4. Constraints.** The use of UAS can potentially implicate environmental, privacy, civil rights and civil liberties interests. For this reason:

4.1. Imaging surface objects located on DoD-controlled installations or within DoD Scheduled SUA is permitted as long as the acquired imagery is not for the purpose of obtaining information about specific USPER, NDAP, or private property. Such imagery may incidentally include USPER, NDAP, or private property, such as homes and vehicles, without prior consent. (T-0)

4.2. Imaging specified USPER, NDAP, and non-DoD controlled property when located outside of DoD controlled installations requires prior written consent. (T-0)

4.3. Surveillance of USPER or NDAP is prohibited unless permitted by law and approved by the Secretary of Defense (SecDef). (T-0)

4.4. It is prohibited to collect, use, retain or disseminate any data in a manner that would violate the First Amendment or in any manner that would discriminate against persons based upon their ethnicity, race, gender, national origin, religion, sexual orientation, or gender identify in violation of the law. (T-0)

4.5. All UAS operations will be under the control or purview of the USAFA UAS Center as prescribed in paragraph 6.1.

**5. Requirements.** The acquisition or collection of information with a UAS must always be consistent with and relevant to an authorized purpose. All acquisition, collection, retention, and dissemination of information during domestic UAS use will be IAW applicable standing DoD and AF intelligence oversight (IO) guidance. This includes coordination and review of a proper use memorandum (PUM) IAW AFI 14-104. (T-0)

5.1. DoD personnel involved in UAS use require initial and annual refresher IO training. The IO training on the Advanced Distributed Learning Service (ADLS) website will satisfy this requirement. Contractor training requirements will be identified by the required technical activity to the contracting activity for inclusion in the appropriate contract. (T-0)

5.2. The USAFA UAS Center will conduct a self-inspection in alignment with the USAFA self-inspection plan. (T-3)

5.3. The USAFA UAS Center will maintain records summarizing USAFA's UAS operations for each fiscal year, to include a brief description of the types and categories of missions flown and the number of times USAFA provided assistance to other agencies, or to State, local, tribal or territorial governments, for purposes of an annual public report. (T-3) This summary will not reveal information that could reasonably be expected to compromise law enforcement or national security. (T-0)

5.4. The USAFA UAS Center will provide notice to the public regarding where USAFA UAS or UAS activities subject to this instruction are authorized to operate in the National Airspace System (NAS) and keep the public informed about the USAFA UAS program as well as any changes that would significantly affect privacy, civil rights, or civil liberties

through FAA Notices to Airman (NOTAMs). (T-0) This notice will not reveal information that could reasonably be expected to compromise law enforcement or national security. (T-0)

**6. Overview of Approval Authority and Coordination.** Generally, approval for UAS use requires three components: 1) a Request for Use Form indicating appropriate-level DoD/AF/USAF A approval for specific UAS mission(s); 2) a PUM certifying compliance with applicable Intelligence Oversight (IO) rules; and, 3) an Approved Certificate of Authorization (CoA) indicating compliance with FAA rules. (T-3) The first component, the UAS Request Form, coordinates all three general requirements. (T-3) Once the UAS Request Form has been approved, individual flights must be authorized through the Air Operations Center. (T-3)

6.1. UAS operations must comply with all applicable laws, regulations and policies, to include, the proper level of approval for a particular UAS use. (T-0) This requires standardized processes for coordination, staffing and, when required, approvals or notifications. (T-0) For this reason, USAFA requires that all use of UAS by USAFA-assigned, attached or affiliated personnel on DoD controlled property, within DoD Scheduled SUA or with USAFA assets be coordinated with and/or proper approvals be sought through the USAFA UAS Center as the single point of contact (POC) for the USAFA UAS program. (T-0)

6.2. Approval of a Proper Use Memorandum (PUM) does not equate to approval for any particular mission. Approval authorities for UAS use vary. SecDef is the approval authority for UAS use for DSCA. (T-0) Federal, state, local and tribal authorities should be encouraged to identify non-DoD options prior to initiating requests for use of a DoD UAS asset. DoD UAS may not be used for immediate response. (T-0) Refer to Attachment 2, UAS Authorities Matrix, for a comprehensive overview of the proper level of approvals required for a particular domestic UAS use. (T-0)

**7. UAS Request for Use Form Approval Process.** Regardless of the purpose, only a commander or equivalent can request to use UAS on DoD controlled property, in DoD Scheduled SUA, or with an USAFA UAS asset (“requestor”), even if done on behalf of another person or agency. (T-3) See Table 7.1. below for appropriate requestor levels. (T-3)

**Table 7.1. Requestor Levels for UAS Request for Use Forms.**

<b>Organization</b>	<b>Requestor Level</b>
USAFA Faculty	Department Head or higher
USAFA HQ	Director or higher
10th Air Base Wing	Wing Commander
Athletic Department	Athletic Director
Preparatory School	Commander
Cadet Wing	Commandant

7.1. The requestor will coordinate with the USAFA UAS Center Operations Officer (Director of Flight Ops) via the NIPRNet [USAFA UAS Ops@usafa.edu](mailto:USAFA_UAS_Ops@usafa.edu), or as appropriate and will provide the following: (T-3)

7.1.1. UAS Request for Use Form: Requestors must submit the UAS Request for Use Form, USAFA Form 100, to the UAS Center, together with all documentation required by the UAS Center, within the timeframes required by the UAS Center. (T-3) Note that the UAS Center may require earlier submission for UAS Request Forms that will require higher level notification or approval. (T-3) The UAS Center Director approves the UAS Request for Use Form and or forwards it for higher-level approval. (T-3)

7.1.2. PUM Certification or Request. UAS use involving domestic imagery will require a PUM. When submitting the UAS Request Form, requestors must certify they have an applicable PUM or indicate they require a new PUM or amended PUM. (T-0) [Some UAS uses, including recurrent training, may merit a comprehensive annual PUM. Consult with the USAFA UAS Center staff to determine whether an annual PUM should or does exist for purposes of a particular UAS use]. (T-0)

7.1.2.1. If a new PUM or a PUM amendment is required, include Attachment 3, Request for PUM, as an attachment to the UAS Request for Use Form.

7.1.3. FAA CoA Certification or Request. UAS use must comply with applicable FAA requirements. (T-0) When submitting the UAS Request Form, requestors must certify their activities fall within an existing CoA or indicate they require USAFA UAS Center assistance in obtaining one. (T-0) If a new CoA is required, indicate this on the UAS Request for Use Form. (T-0)

7.2. Annual Approvals. Recurrent events may only require an annual UAS Request for Use Form approval at the discretion of the UAS Center Director. (T-3) The UAS center may establish deadlines for annual submissions. (T-3) The Director of Flight Ops retains control of individual missions. (T-3)

7.3. Flight Authorization. Once the UAS Request for Use Form has been approved at the appropriate level, the Director of UAS Flight Ops authorizes each individual flight according to procedures implemented by the UAS Center Director. (T-3)

## **8. Interest Items.**

8.1. Defense Support of Civil Authorities (DSCA). DSCA consists of temporary support to U.S. civil agencies, e.g. Federal Emergency Management Agency (FEMA), Department of Homeland Security (DHS) for domestic emergencies. SecDef approval is required for all DSCA IAW DoD policy. (T-0)

8.1.1. Civil and Search and Rescue (SAR). Although SAR is DSCA, SecDef has delegated this authority for SAR events to the Air Force Rescue Coordination Center (AFRCC) and other rescue coordination centers. (T-0) Support for SAR with a UAS requires a UAS Use Request package through the USAFA UAS Center for pre-use approval by the AFRCC. (T-0)

8.1.2. Immediate Response Authority (IRA). IRA supported by DoD is triggered by a request from civil authorities under "imminently serious conditions" with no time to seek approval from higher authority. (T-0) COMMANDERS DO NOT HAVE IMMEDIATE RESPONSE AUTHORITY to give support to civil authorities through the UAS even if, in their judgment, there is an immediate threat to life, limb, to save lives, prevent human suffering, or mitigate great property damage. (T-0) For SAR, AFRCC must approve the

UAS use. For non-SAR events, such as wildfires or floods, the approval authority is the SecDef. (T-0)

8.2. Civil Disturbance Operations (CDO) and Emergency Response Authority (ERA). CDOs involve sudden and unexpected civil disturbances where local authorities are unable to control the situation. (T-0) The significant policy concern is the primacy of civilian authorities. The President of the United States (POTUS) is approval authority for domestic use of UAS for CDO. (T-0) Under ERA, local commanders can engage temporarily in activities that are necessary to quell large-scale, unexpected civil disturbances when necessary to prevent significant loss of life or wanton destruction of property, to restore governmental function and public order, or when duly constituted Federal, State, or local authorities are unable or decline to provide adequate protection for Federal property or Federal Governmental functions. (T-0) ERA only applies in extraordinary emergency circumstances where prior authorization by the POTUS is impossible and duly constituted local authorities are unable to control the situation. (T-0)

8.3. Incidental Acquisition/Collection of Crimes/Terrorism. Any information regarding potential threats to life or property incidentally acquired with a UAS during the course of routine activities and authorized missions must immediately be reported to the appropriate entity(s) with responsibility for countering the threat(s) and to Air Force Office of Special Investigations (AFOSI). (T-0)

8.4. State/National Guard UAS Use. State/National Guard use of DoD UAS is subject to SecDef approval. Consult with the USAFA UAS Center on any requested state or National Guard UAS use as part of the USAFA UAS program. (T-0)

8.5. Realistic Military Training (RMT) Off Federal Real Property. RMT off Federal real property requires close coordination with civilian community partners, the media, and higher headquarters (HHQ). (T-0) DoDI 1322.28, *Realistic Military Training (RMT) Off Federal Real Property*, provides explicit direction to take into account the needs of civilian law enforcement officials for information to the maximum extent practicable in the planning and execution of military training or operations; contains notice requirements depending on the level of risk associated with the event; and if UAS are used in coordination with ground forces, provides unique approval authorities and notification procedures. (T-0) IAW DepSecDef PM 15-002, found at [https://whsddpubs.dtic.mil/secpolicymemo/PM15002\\_CAC.pdf](https://whsddpubs.dtic.mil/secpolicymemo/PM15002_CAC.pdf), the use of DoD UAS in domestic training and exercises conducted with Federal, State, or local law enforcement agencies requires SECDEF approval. (T-0) Consult with the USAFA UAS Center for any RMT issues. (T-0)

8.6. Questionable Intelligence Activities (QIA) and Significant or Highly Sensitive Matters (SHSM). Use of UAS for any purpose without the required level of approval, may trigger the submission of a QIA or SHSM report. (T-0) When required, investigations into QIA or SHSM should be conducted using the Secretary Air Force Inspector General Complaints Resolution Directorate (SAF/IGQ) *Commander Directed Investigations Guide*. (T-0) Consult with the USAFA UAS Center and AFOSI for any QIA/SHSM issues. (T-0)

8.6.1. A QIA is “an intelligence activity, as defined in Executive Order 12333, *United States Intelligence Activities*, that may be unlawful or contrary to executive order, Presidential directive, or applicable DoD policy governing that activity.” (T-0)



8.6.2. An SHSM is, “A development or circumstance involving an intelligence activity or intelligence personnel that could impugn the reputation or integrity of the DoD Intelligence Community or otherwise call into question the propriety of an intelligence activity,” as manifested in Congressional inquiries or investigations, adverse media coverage, impact on foreign relations or partners, or related to the unauthorized disclosure of classified or protected information (except routine security violations). (T-0)

8.7. Armed UAS. Armed UAS may not be used in the U.S. for other than training, exercises and testing purposes. SECDEF approval is required prior to domestic training, exercise or testing events employing armed UAS outside of DoD SUA. (T-0)

8.8. Privacy Protections. The collection, retention and dissemination of UAS acquired or collected information must comply with the Privacy Act (PA) of 1974. For questions about the PA, consult the USAFA UAS Center. (T-0)

## **9. Roles and Responsibilities.**

9.1. USAFA Superintendent (USAFA/CC). The USAFA/CC has responsibility for, and oversight over, the USAFA UAS Program. This responsibility may be delegated to the Dean of the Faculty (DF), with the exception of coordination/final approval of UAS Use Request Packages which require Chairman of the Joint Chiefs of Staff (CJCS), AFRCC, or SecDef notification and approval. In such cases, the Dean of Faculty coordinates and the USAFA/CC signs before submission of the package.

9.2. Dean of the Faculty (DF). The DF may be delegated responsibility for, and oversight over, the USAFA UAS Program, with the exception of coordination/final approval of UAS Use Request Packages which require CJCS, AFRCC, or SecDef notification and approval. In such cases, the DF coordinates and the USAFA/CC signs before submission of the package. The DF exercises oversight over the USAFA UAS program through the USAFA UAS Center Director.

9.3. USAFA UAS Center. The USAFA UAS Center is an organization comprised of subject matter experts directly and indirectly supporting the USAFA UAS program, including, but not limited to the USAFA UAS Center Director, USAFA UAS Center Director of Flight Ops, and the designated USAFA Director of Intelligence (USAFA/A2). The UAS Center, under the direction of the UAS Center Director, shall (T-3):

9.3.1. Review and coordinate all UAS use requests under this instruction for completeness and mission impacts. The UAS Center shall establish and require use of a UAS Request for Use Form for coordination and approval of all UAS use under this instruction. (T-3) The UAS Request for Use Form shall be a concise form including, at a minimum: Requestor's identity with attached legal documents indicating Requestor's relationship to USAFA (if applicable); Use Dates; Platform and Sensor information; Ultimate purpose or effect of the UAS mission plus justification; Whether the platform is armed; Location of the Mission plus attached or identified maps; Whether an applicable PUM has been certified plus the attached or identified PUM; Whether a COA exists plus attached or identified COA; identification of location and targets imaged, specifically identifying U.S. Persons, non-DoD Persons, and non-DoD controlled Property that will be imaged and whether the imagery is targeted or incidental; How information will be



used; how imagery will be retained; how imagery will be disseminated; Scope of consents specifically indicating consent for imagery collection, imagery retention, and imagery dissemination.

9.3.2. Timely coordinate with other agencies as needed, such as: the FAA for CoA, NOTAMs; higher headquarters operations functions (HAF/A3); the 306th Flying Training Group (FTG) to coordinate and deconflict airspace; and, Air Force Special Operations Command (AFSOC), the Air Force lead for small UAS. (T-0)

9.3.3. Coordinate with USAFA Legal Office (USAFA/JA) to ensure operations are in compliance with applicable laws and regulations.

9.4. Collaborate with the designated USAFA/A2 to ensure that cadet UAS training includes IO awareness. (T-3)

9.4.1. The USAFA UAS Center Director.

9.4.1.1. The UAS Center Director may be delegated approval authority for Request For Use Forms that do not require HHQ, CJCS, AFRCC, or SecDef approval or notification. For UAS Request for Use Forms requiring HHQ, CJCS, AFRCC, or SecDef approval or notification, the Director will staff any request for approval to the appropriate external authority through the DF and USAFA/CC using HQ USAFA staff processes. (T-0)

9.4.1.2. The UAS Center Director shall notify DF, before approval, of any UAS use: occurring outside DoD SUA; likely to result in local or national media attention; likely to result in local or national political inquiry; likely to collect imagery (even incidentally) on individuals or groups engaged in the exercise of constitutional or civil rights, including without limitation rights arising under the First Amendment of the United States Constitution; and any UAS use involving foreign government participation.

9.4.1.3. Maintains information on UAS use, to be inspected or reported, as required by law, regulation or policy.

9.4.1.4. Ensures that UAS use complies with applicable laws, regulations and policies.

9.4.1.5. Ensures notification of a mishap of any UAS (USAFA or non-USAFA) operated in USAFA airspace to USAFA Director of Safety (USAFA/SE) for further termination ore reportability and/or investigation requirement.

9.4.2. Designated USAFA/A2. The USAFA/CC appoints the officer designated to serve the intelligence functions (USAFA/A2), who generally will be the Senior O-6 with AFSC 14N. (T-3) The USAFA/A2 will oversee IO issues arising out of the USAFA UAS Center including (T-3):

9.4.2.1. Point of contact with HAF/A2 for USAFA IO matters;

9.4.2.2. Appointment of a designated USAFA Intelligence Plans and Requirements (USAFA/A2X) for purposes of drafting PUMS, if needed;

9.4.2.3. Approval authority on PUMs;

- 9.4.2.4. Appointment and functional oversight of an IO Monitor;
  - 9.4.2.4.1. Ensure appropriate IO training has been conducted;
  - 9.4.2.4.2. Review annual IO self-inspections;
  - 9.4.2.4.3. USAFA liaison for USAFA/IG on IO inspections;
- 9.4.2.5. Review all UAS Request for Use Forms for compliance with IO policies.
- 9.4.2.6. USAFA/A2X. USAFA/A2X personnel, when appointed by the USAFA/A2 will:
  - 9.4.2.6.1. Draft or amend PUMs, as needed.
  - 9.4.2.6.2. Review all submitted UAS Request for Use Forms for compliance with IO policies.
  - 9.4.2.6.3. Act as IO Monitor;
    - 9.4.2.6.3.1. Ensure appropriate IO training has been conducted;
    - 9.4.2.6.3.2. Conduct annual IO self-inspections;
    - 9.4.2.6.3.3. Coordinate with USAFA UAS Program Director of Flight Ops to ensure cadet UAS training includes IO awareness.
- 9.4.3. The USAFA UAS Center Director of UAS Flight Ops. Once the UAS Request for Use Form has been approved at the appropriate level, the UAS Center Director of Flight Operations retains flight oversight and authorizes all individual flights through the Air Operations Center according to procedures implemented by the UAS Center Director. (T-3)
- 9.5. USAFA Legal Office (USAFA/JA). USAFA/JA will provide operations and intelligence law advice, as follows: (T-3)
  - 9.5.1. Will review all USAFA PUMs for legal sufficiency;
  - 9.5.2. Will review all submitted UAS Request for Use Forms and related information for compliance with applicable laws and policies.
  - 9.5.3. Will provide other advice to the USAFA UAS Center, as appropriate.
- 9.6. USAFA Director of Communications (USAFA/CM).
  - 9.6.1. USAFA/CM will review and coordinate any talking points or media plans associated with USAFA UAS program as required.
  - 9.6.2. USAFA will provide a security and policy review on any non-classified content that has the potential of release outside the DoD, per AFI 35-102, *Security and Policy Review Process*. (T-O)
- 9.7. USAFA/IG.
  - 9.7.1. USAFA/IG will receive annual USAFA UAS Program IO Staff Assistance Visit (SAV) inspection report and other reports, as required. (T-0)
  - 9.7.2. USAFA/IG will submit QIA/SHSM reports, when necessary, through IG channels and coordinate AFOSI. (T-0)

9.8. USAFA Office of Information Protection Directorate (USAFA/IP) Foreign Disclosure Office. USAFA/IP will review all UAS Request for Use Forms involving foreign government participation to determine whether the particular nation has an appropriate delegation of disclosure authorization letter on file and coordinate with AFOSI as required. (T-0)

9.9. USAFA Director of Research Scientific and Technical Information Officer (USAFA/DFRE STINFO).

9.9.1. USAFA/DFRE STINFO will review all UAS Request for Use Forms involving foreign government participation to ensure compliance with Foreign Disclosure requirements and coordinate with AFOSI, as required. (T-0)

9.9.2. USAFA/DFRE STINFO will ensure UAS export controlled information and technology is protected against unauthorized disclosure via oral, visual and documentary means to foreign nationals. (T-0)

9.10. 306th Flying Training Group (FTG). FTG will ensure airspace deconfliction once notified of UAS request provided by the USAFA UAS Program Director of Flight Ops. (T-0)

9.11. During normal duty hours, the United States Air Force Academy (USAFA) Cadet Model Engineering Club (Club) will coordinate with the USAFA UAS Air Operations Center (AOC) prior to flights to receive any flight safety-related information. If the Club attempts to contact the USAFA UAS AOC but is unable to reach anyone, the Club may proceed to fly with caution. There is no requirement to contact the USAFA UAS AOC for flights outside of normal duty hours. However, the Club will maintain constant situational awareness of any and all flying operations in USAFA airspace.

9.12. USAFA/SE will coordinate with USAFA UAS Center Director/Program Director of Flight Ops upon notification of any UAS mishap within USAFA airspace for further determination of reportability and/or investigation requirement.

MICHELLE D. JOHNSON, Lieutenant General,  
USAF  
Superintendent

**Attachment 1****GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

10 U.S.C. § 331-335, *Insurrection Act*

10 U.S.C. § 371, *Use of information collected during military operations*

Executive Order 12333, *United States Intelligence Activities*, as Amended

Presidential Memorandum: *Promoting Economic Competitiveness While Safeguarding Privacy, Civil Rights, and Civil Liberties in Domestic Use of Unmanned Aircraft Systems*, February 15, 2015

Secretary of Defense Memorandum, *Leveraging Military Training for Incidental Support of Civil Authorities*, 11 December 2012

Deputy Secretary of Defense Policy Memorandum 15-002, *Guidance for the Domestic Use of Unmanned Aerial Systems*, February 17, 2015

Directive Type Memo 08-052, *DoD Guidance for Reporting Questionable Intelligence Activities and Significant or Highly Sensitive Matters*, 17 June 2009, Incorporating Change 3, 30 July 2012

Joint Publication 3-28, *Defense Support of Civil Authorities*, 31 July 2013

Chairman, Joint Chiefs of Staff (CJCS) Message, DTG 071415Z Jun 13, subject: *Standing Defense Support of Civil Authorities (DSCA) Execute Order (EXORD)*

DoDD 3025.18, *Defense Support of Civil Authorities (DSCA)*, 29 December 2010, incorporating Change 1, 21 September 2012

DoD Directive 5240.01, *DoD Intelligence Activities*, 27 August 2007

DoDI 1322.28, *Realistic Military Training (RMT) Off Federal Real Property*, 18 March 2013

DoDI 3025.21, *Defense Support of Civilian Law Enforcement Agencies*, 27 Feb 2013

DoD 5240.1-R, *Procedures Governing the Activities of DoD intelligence Components that Affect United States Persons*, December 1982

DoDD 5200.27, *Acquisition of Information Concerning Persons and Organizations not Affiliated with the Department of Defense*, 7 January 1980

AF Doctrine Document 3-10, *Force Protection*, 28 July 2011

AF Instruction 31-101, *Integrated Defense*, 8 October 2009

AF Instruction 14-104, *Oversight of Intelligence Activities*, 23 April 2012

AF Instruction 14-119, *Intelligence Support to Force Protection*, June 2011

AF Instruction 10-801, *Defense Support of Civil Authorities*, 19 September 2012

AF Instruction 33-360, *Publications and Forms Management*, 1 December 2015

AFMAN 33-363, *Management of Records*, 9 April 2015

National Guard Regulation 500-2/Air National Guard Instruction 10-801, *National Guard Counterdrug Support*, 28 August 2008

***Prescribed Forms***

USAF Form 100, *Unmanned Aircraft Systems Request for Use Form*

***Adopted Forms***

AF Form 847, *Recommendation for Change of Publication*

***Abbreviations and Acronyms***

**AF**—Air Force

**AFI**—Air Force Instruction

**AFR**—Air Force Reserve

**AFRCC**—Air Force Rescue Coordination Center

**ANG**—Air National Guard

**CC**—Commander

**CJCS**—Chairman of the Joint Chiefs of Staff

**CoA**—Certificate of Authorization

**CONOPS**—Concept of Operations

**DI**—Domestic Imagery

**DoD**—Department of Defense

**DSCA**—Defense Support of Civil Authorities

**EO**—Electro-Optical

**FAA**—Federal Aviation Administration

**FMV**—Full Motion Video

**HAF**—Headquarters Air Force

**HHQ**—Higher Headquarters

**IAA**—Incident Awareness and Assessment

**IAW**—In Accordance With

**ID**—Identification

**IO**—Intelligence Oversight

**IRA**—Immediate Response Authority

**JA**—Judge Advocate

**JDOMS**—Joint Director of Military Support

**LEA**—Law Enforcement Agency

**NIPRNet**—Non-Classified Internet Protocol Router Network

**MOA**—Military Operation Area

**PAD**—Processing, Analysis and Dissemination

**POTUS**—President of the United States

**PUM**—Proper Use Memorandum

**QIA**—Questionable Intelligence Activity

**RFA**—Request for Assistance

**RFF**—Request for Forces (RFF)

**RMT**—Realistic Military Training

**SA**—Situational Awareness

**SAD**—State Active Duty

**SAR**—Search and Rescue

**SecDef**—Secretary of Defense

**SIPRNet**—Secret Internet Protocol Router Network

**UAS**—Unmanned Aircraft System

**USNORTHCOM**—United States Northern Command

**USPACOM**—United States Pacific Command

## Attachment 2

## UAS AUTHORITIES MATRIX (T-0)

Table A2.1. UAS Authorities Matrix (T-0).

Mission	Approval Authority	Applicable Guidance (see References)	Notes
<b>Counter Intelligence/ Foreign Intelligence (CI/FI)</b>	Varies (depends on collection procedures to be used).	Executive order 12333; DoD 5240.01; DoDD 5240.1-R; AFI 14-104 JP 3-28	<ul style="list-style-type: none"> <li>- Only “Intelligence Components” (ICs) are authorized to conduct CI/FI (e.g., AFOSI). “Intelligence Oversight” (IO) rules (Executive Order 12333 et al) apply. The only regulation that codifies this is Joint Publication 3-28, Defense Support of Civil Authorities 31 July 13.</li> <li>- USAF operational support to a non-AF CI/FI mission will require SecDef approval.</li> <li>- If CI/FI, the approval authority varies depending on special collection procedures to be used: Procedure 5 – Electronic Surveillance; Procedure 6 – Concealed Monitoring; Procedure 7 – Non-Consensual Physical Searches; Procedure 8 – Mail Searches and Examination; Procedure 9 – Physical Surveillance; Procedure 10 – Undisclosed Participation in Organizations</li> </ul>
<b>Defense Support of Civil Authorities (DSCA)</b>	SecDef	DepSecDef PM 15-002 CJCS DSCA EXORD DoDD 3025.18 DoD 5240.1-R DODD 5200.27 JP 3-28	<ul style="list-style-type: none"> <li>- Para 4. requires SecDef approval for UAS support to DSCA</li> <li>- *There is no immediate response exception for SecDef approval.</li> <li>- *All DSCA – including under IRA where applicable - must be evaluated under the CARLL factors found at DoDD 3025.18, para. 4.e.</li> <li>- The CJCS DSCA EXORD applies only to USNORTHCOM missions. The 7 delegated authorities in the Standing DSCA EXORD are: Situational Awareness, Damage Assessment, Evacuation Monitoring,</li> </ul>



Mission	Approval Authority	Applicable Guidance (see References)	Notes
			Search and Rescue (SAR), Chemical, Biological, Radiological, Nuclear and Enhanced Conventional Weapons (CBRNE) Assessment, Hydrographic Survey, Dynamic ground coordination. The DSCA EXORD is currently under revision so refer to the most current version. However, USNORTHCOM/CC has to still obtain SecDef approval for use of UAS.
<b>Force Protection (FP)</b>	SecDef	DepSecDef PM 15-002 DoDD 5200.27 DoD 5240.1-R DODD 5200.27JP 3-28 (para. V-3) AFDD 3-10; AFI 31-101 AFI 14-119 AFI 14-104;	<ul style="list-style-type: none"> <li>- <u>There is currently no direct guidance on use of UAS for FP.</u></li> <li>- DepSecDef PM 15-002 directs policy be created. In interim, seek SecDef approval</li> <li>- Depending on the situation, may need to coordinate with local LEA.</li> </ul>
<b>Civil Disturbance Operations (CDO)</b>	POTUS	10 U.S.C. 331-335; DoDD 5200.27; DoDD 3025.18; DoDI 3025.21	<ul style="list-style-type: none"> <li>- CDOs are dependent on POTUS invoking the Insurrection Act, regardless of asset used.</li> <li>- Local CCs do not have the independent authority to use RPAs even if ERA</li> </ul>
<b>Search and Rescue (SAR)</b>	AFRCC	National SAR Plan; National SAR Supplement; ICAO / Chicago Convention; DepSecDef PM 15-002 DoDD 3025.18; DODD 5200.27; DoD 5240.1-R DoDI 3003.01; DoDI 3025.21; AFDD 10-45;	<ul style="list-style-type: none"> <li>- SAR is a form of DSCA. Per DoDD 3025.18, para. 4(o) SecDef approval is required to use RPA ISO DSCA. However, DepSecDef PM 15-002 creates a SAR exception/delegation – AFRCC is approval authority for inland SAR</li> <li>- *There is no exception for IRA</li> </ul>

<b>Support to Law Enforcement Agencies (LEA)</b>	SecDef	DepSecDef PM 15-002 10 USC 371 DODD 5200.27, DoDI 1322.28 See EN xiv DoDI 3025.21 DoD 5240.1-R	- SecDef approval for all use of IC equipment such as UAS for other than FI/CI purposes - Assistance to LEA (for non-CI/FI) is a form of DSCA. DoDD 3025.18 Para. 4(o) states that SecDef approval is required for UAS ISO DSCA. See also DoDI 3025.21.
<b>Counterdrug Operations (CD)</b>	SecDef or GCCs (NORTHCOM / PACOM / SOUTHCOM CCs)	1991 NDAA 1004, as amended 10 U.S.C. § 371 10 U.S.C. § 374 SecDef Memo 2 Oct 03, Support to Domestic LEA SecDef Memo 24 Dec 08 – International Counternarcotic Support DepSecDef PM 15-002 CJCSI 3710.01B NGR 500-2/ANGI 01-801 DoD 5240.1-R	- SecDef approval for all use of IC equipment such as ISR equipment (UAS for other than FI/CI purposes) - CD ops are not DSCA or LEA. - GCCs can approve UAS use for aerial recon (AR) - GCCs can conduct CD missions <u>except</u> to target/ track vehicles, buildings, persons in U.S. to provide coordinates to LEAs that is <u>not</u> continuation of detection & monitoring (D&M) mission; or drug air/surface traffic outside 25 miles inside U.S. territory. USD(P) or ASD(SOLIC) is approval authority for these. - GCCs must first determine whether T.32 forces can accomplish
<b>Training, Testing, Research</b>	Varies- SecDef or Local CC – May be notification requirements!	10 U.S.C 8013 DepSecDef PM 15-002 10 USC 371 DODD 5200.27; DoDI 1322 AFI 14-104	- SecDef approval if will include conducting “nonconsensual surveillance” on USPER or NDAP (DepSecDef PM 15-002; AFI 14-104, para. 9.6) - SecDef notification if large UAS used outside DoD Scheduled SUA - SecDef approval if UAS armed and outside the DoD Scheduled SUA - SecDef approval if with LEA - Local CC if small UAS outside DoD installation or outside DoD scheduled SUA. May require COA. Coordinate with USAFA UAS Center. - Local CC/equivalent if any UAS within DoD installation or DoD Scheduled SUA. If domestic imagery involved, will require a PUM and CoA. Coordinate with

			USAF UAS Center. - Local CC/equivalent if UAS use on DoD controlled property or within DoD Scheduled SUA and does not involve domestic imagery. May require CoA. Still must coordinate with USAFA UAS Center.
<b>Other Authorized DoD Missions (e.g., claims)</b>	SecDef	Varies	- Facts will drive these scenarios and approval authorities. - Assume as a matter of policy, use of an UAS for an authorized DoD mission other than those discussed above would require SecDef approval.

## Attachment 3

## REQUEST FOR PUM

## PROPER USE MEMORANDUM (PUM) REQUEST CHECKLIST

This checklist describes the process to generate a PUM and obtain approval from the designated A2 officer. The following will be accomplished upon notification of domestic UAS use involving the acquisition or collection of information (training or operational) that are not covered by current PUMs. A sample PUM follows this checklist to provide insight into the level of detail required.

REQUESTOR ACTIONS TO PERFORM/CONSIDERATIONS:

- \_\_\_\_ 1. Identify what sensors and aircraft are to be employed
- \_\_\_\_ 2. Identify which flying unit/departments/agency etc. is operating the aircraft
- \_\_\_\_ 3. Identify the purpose of the use/mission and areas to be imaged
- \_\_\_\_ 4. If applicable, identify which exploitation unit will exploit the imagery
- \_\_\_\_ 5. Identify dissemination requirements. (Who will receive and use the data?)
- \_\_\_\_ 6. Identify anticipated retention timeframes and means of retention
- \_\_\_\_ 7. POC for request:

All of the above information is used to develop the PUM. The PUM may be sent to several agencies simultaneously to expedite approval.

Imagery collected in the U.S. is documented specifically by intent, user, timeframe, and area collected. If any of these elements in the PUM change, the requirement must be re-submitted as another PUM for approval.

The main information required to complete a PUM, includes sensors, platforms, areas to be imaged, purpose/justification, exploitation unit, dissemination requirements, and POC's. Forward requests as soon as possible to USAFA/A2X.

**SAMPLE PUM**

(\*note- U//FOUO when filled out)

(Date)

MEMORANDUM FOR [USE REQUESTOR]

SUBJECT: USAFA PROPER USE MEMORANDUM (PUM) FOR AIRBORNE DOMESTIC  
IMAGERY FOR TRAINING (U)

(U) This memorandum represents the USAFA PUM for [Use Requestor] to collect or acquire Small Unmanned Aerial System (SUAS) imagery during [Mission Description] for a one year period on the USAFA installation. This PUM covers imagery and data collected or acquired by the USAFA and USAFA-controlled airframes and their associated sensors listed in Attachment 1.

(U) All references in this PUM to United States Persons (USPERS) shall include Non-DoD Affiliated Persons.

**Collection / Acquisition.** This imagery will only be collected or acquired during flights conducted by or with [Use Requestor]. Imagery may be used for navigation and simulated target detection, location, and tracking. Imagery will only be collected for a justified need, and only to the extent necessary, for valid upgrade and continuation training requirements within the core function of the USAFA assigned mission area. Imagery will not be acquired or collected (except incidentally) about specified USPERS or non-DoD controlled property or facilities without consent. Collection or acquisition of imagery will occur only in the USAFA airspace approved for SUAS operations depicted in Attachment 2. The boundary encompasses: N39° 02' 30.45" W104° 50' 49.45", N39° 02' 29.97" W104° 54.43.24', N38° 57' 04.01' W104° 54' 39.52", N38° 57' 04.01" W104° 50' 06.39", N38° 56' 36.17" W104° 49' 23.95", N38° 57' 40.01" W104° 48' 23.67", N39° 02' 30.45" W104° 50' 49.45". Airspace altitude restrictions will be below 1200' AGL, and below 700' AGL beneath the 700' in Colorado Springs Class E airspace, including the USAFA airfield in non-Class D hours. Military facilities, training areas/ranges, Military Operating Areas, and transit corridors may be imaged as long as there is no intention to collect on non-DoD affiliated Persons or specific USPERS.

(U) **Dissemination.** [Use Requestor] will be the primary end-user of the imagery. Imagery, information, and derived products will be controlled and disseminated strictly within USAFA, Department of Defense and United States Air Force official channels, unless otherwise approved by the designated USAFA/A2 officer. Imagery will not be disseminated outside of the Department of Defense unless dissemination is required by law or fulfills an authorized purpose and complies with agency requirements. Information disseminated under this paragraph may be disseminated via hard/softcopy methods and will be protected in accordance with Air Force standards and requirements.

(U) **Retention.** Imagery containing information about USPERS who have not consented to imagery retention (whether collected incidentally or by consent) may be retained for a period of [90] days solely for the purpose of determining whether imagery may be lawfully permanently retained. Imagery that does not contain information about non-DoD affiliated Persons or USPERS may be retained indefinitely.

(U) This PUM does not authorize specific USAFA operational missions (i.e. force protection, perimeter defense, anti-terrorism, etc.). Rather, this PUM certifies that imagery acquisition, collection, exploitation, dissemination, and retention is in support of valid training requirements and that these missions will comply with Air Force and DOD Intelligence Oversight (IO)

policies. Any other imaging beyond the scope of the collection areas, retention, and dissemination parameters in this PUM is not authorized.

(U) **Legal Review:** This document has been reviewed for legal sufficiency by [Legal Reviewer], HQ USAFA, Assistant Staff Judge Advocate, DSN 333-6940, [Legal Reviewer Email].

(U) **Certification:** (U) I certify the intended collection and use of requested information, materials, and imagery are in support of congressionally approved programs and are not in violation of applicable laws. The request for imagery is not for the purpose of targeting any specific U.S. person, nor is it inconsistent with Constitutional and other legal rights of U.S. persons. Applicable security regulations and guidelines, and other restrictions will be followed. I am authorized as certifying official on behalf of the requesting unit, and understand I am responsible for the accuracy of the information contained herein and for the proper safeguarding of products received in response.

[A2], Colonel, USAF  
HQ USAFA/A2

2 Attachments:

1. List of Aircraft and Sensors
2. Map of Collection/Acquisition Area